

Greater Southeast Alaska Conservation Community

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Vallenar Young Growth Project
Ketchikan-Misty Fjords RD
Ketchikan, Alaska
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Subj: Scoping comments on the Vallenar Young Growth Project

Dear Vallenar YG Project Team;

These are timely scoping comments on the Vallenar Young Growth Project, by GSACC (the Greater SE Alaska Conservation Community). The comment period was initiated with a notice of intent published in the Ketchikan Daily News on May 9, for 30 days.

The project contemplates logging 60-70 year old second growth forest within a project area stated variously in the Scoping Information document as being 315 and 886 acre in size, by either clearcutting or single tree selection rotational methods, except that within RMAs (riparian management areas) the method would be commercial or precommercial thinnings.

Comments

A. The project must be re-scoped

The project must be re-scoped because the Scoping Information document¹: (1) contains conflicting text; (2) contains uncompleted text; (3) omits other important facts that the Forest Service should have presented to the public for the public's consideration at this stage; and (4) mentions only Forest Plan direction from Chapter 5 of the Forest Plan (that being new Plan content regarding economies, timber, young growth, and riparian areas), but omits mention of Forest Plan direction in the preceding chapters of the Plan that are relevant to scoping level attention (e.g. regarding wildlife, wildlife habitat and aquatic resources).

1. Conflicting text. Page 1 of the document states the project area is 886 acres in size (including 587 acres of national forest land and 229 acres of State of Alaska land). On page 4 the Proposed Action description says the project area is 315 acres. This is plain error.

2. Uncompleted text. Page 1 of the document ends with “, and”. The next two pages are maps and contain no body text. The fourth page begins with a new section, and therefore the dangling paragraph on page 1 was not completed. The extent of the missing text is unknown, but could be of significance to the public.

3. Omission of important information relevant to cumulative impacts. *Background*: The situation regarding cumulative impacts was incompletely and inadequately described for the public's scoping-stage consideration. The Vicinity Map (Fig. 1) and Project Area Map (Fig. 2) show a large amount of “non-federal land” abutting or otherwise in the vicinity of the project area. The 229 acres of “State of Alaska” land noted above in #1 is a portion of that block that

¹
http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/106840_FSPLT3_3990340.pdf

is within the project area, but the whole amount of non-federal land is much larger than that. The third paragraph on p.1 describes the nature of some of that land, but the description is entirely for land on the east side of the island, except for private residences or lots in the Vallenar Bay subdivision. It then states that the “remainder” of the non-federal lands on the island “are under the jurisdiction of the State of Alaska.” On p.4 it is noted that the new “State road is scheduled to be completed in 2017 and is being constructed to access timber harvest on the state lands adjacent to this project area.”

The problems: First, the lands and intent where that non-federal logging would occur are not identified on the map, and are not described and enumerated in the document’s text. Second, there are *two* non-federal “jurisdictions” on which adjacent or nearby logging is planned — the University of Alaska (which does its own planning) and other land controlled by the state’s Division of Forestry — not one. The two are independently managed. Timber sales have been offered or are in preparation on both land-holds. The university offered a large timber sale on its land this year, and although it didn’t sell it is presumably available for purchase. The state’s sale is in the revised best interest finding stage, so the state’s intent and the scale of its project are also known. Consequently, the cumulative impacts this project could cause for wildlife, wildlife habitat and aquatic resources can be expected to be far greater than the Scoping Information document leads the public to believe, and that negatively affects the quality of information that can be obtained through the public scoping process.

The Scoping Information document also failed to provide an estimate of the timber volume (or range of volume) that the project might produce.

Further, the area of the RMAs in the project area and their proportion of the project area were not disclosed, and that information is important for the public’s evaluation the project at this stage. The extent of the RMAs should have been shown on the Project Area Map.

4. Omission of mention of other Forest Plan directives. The Scoping Information document mentions only Forest Plan direction from Chapter 5 of the Forest Plan (that being some new Plan content regarding economies, timber, young growth, and riparian areas), but omits mention of Forest Plan direction in the preceding chapters of the Plan that are relevant to scoping-level attention.

B. We request that the project be terminated, at this stage

The “Need for Proposal” statement does fails to identify a need for this project that would not be met in the absence of the project. The identified needs are “to develop young-growth opportunities ... to develop new markets; or to refine skills and equipment needs ...”, and to support wood products businesses. No other purpose was identified.²

All of the stated needs can be met by the timber sales already in advanced planning by the University of Alaska and the Alaska Division of Forestry, in this very vicinity. Other second growth projects in advanced planning that are located elsewhere. The Forest Service’s Kosciusko Vegetation Management project and the state’s Edna Bay Parlay sale (also on Kosciusko) can also be expected to meet those identified needs — especially the needs “to develop new markets” and “to refine skills and equipment needed,” which are not location-

² We note that the third paragraph of the section has “opportunities” providing “opportunities,” and that its remainder duplicates phrases in the section’s first paragraph. This and the other weakness of the Need for Proposal (that we identify) indicate that this is a project chasing a justification, and that there really is no need for it.

dependent needs. Regarding Gravina Island, the UA and DOF projects would meet those needs that are local.

The “Need for Proposal” section of the Scoping Information document fails to establish a need for the project, so the project should be summarily terminated.

C. Forest Service land on Gravina Island should not be subjected to rotational logging

It is well-established that Gravina Island has a low deer population due to a combination of the natural terrain (very little deer summer range, so deer are on winter range all year which reduces winter carrying capacity) and past loss of old-growth forest to logging. This has caused a disequilibrium between deer and wolves on the island. (Please add the attached documentation to the project record, concerning these facts.)³ Given that other nearby land owners will log with little restriction (under state law) and to a high intensity, the Forest Service should compensate by *not* doing commercial timber extraction on its lands in the project area or elsewhere on the island. Again, the project should be summarily terminated.

D. Alternatives that should be considered if the project proceeds

As noted in Sections B and C above, we ask that this project be dropped. If the project instead proceeds, the action alternatives should include one that avoids activity in the RMAs and relies on only *light*, single-tree selection logging in the non-RMA areas. Removed trees should be ones likely to contribute *least* to future habitat structure as the stand process toward old-growth status.

Sincerely,



Larry Edwards
Vice President

Attachments (please add these to the planning record and record index):

- 1 - Comments_Vallenar Preliminary BIF_(GSACC, GP, TBC, CBD, CW)_5Mar15.pdf
- 2 - Appeal of the Vallenar Bay Timber Sale FBIF_GP, GSACC, Sallee, CW, CBD, TBC_27May15.pdf
- 3 - Corrected addition to Appeal of Vallenar TS FBIF_GP, GSACC, Sallee, CW, CBD, TBC_15Jul15 (20Jul15).pdf
- 4 - ADF&G_2012_Feasibility assessment - Incr'g deer sust harv in part of GMU-1A.pdf
- 5 - ADF&G_2013_Gravina IM Operational Plan (Revised Version, 6-Mar).pdf
- 6 - ADF&G 2002_Ingle memo to Grundy, Final ACMP response on Gravina timber_12Dec02.pdf
- 7 - UA_2017_FINAL Vallenar Bay Timber Terms and Conditions with Exhibit.pdf
- 8 - UA_2017_Offering_Vallenar Bay Competitive Timber Sale_Bids due 10May17.pdf

³ Comments and appeal on the state’s Vallenar Bay sale; ADF&G’s Gravina IM Feasibility Assessment; ADF&G’s Gravina IM Operating Plan; ADF&G (2002, Ingle); and two documents on the University of Alaska’s timber sale. See the attachment list.